

**Before the
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554**

In the Matter of)
)
Request for Review by AT&T of) CC Docket No. 96-45
Decision of Universal Service Administrator) WC Docket No. 05-337

REPLY COMMENTS OF AT&T

AT&T Inc., on behalf of several of its wireless competitive eligible telecommunications carrier (CETC) affiliates (collectively, AT&T), filed with the Commission two appeals of Universal Service Administrative Company (USAC) audit findings on AT&T’s methodology for reporting subscribers with post office (P.O.) box addresses in its high-cost line count filings.¹ As detailed in AT&T’s appeals, AT&T relied on subscriber-supplied billing addresses to populate its high-cost line count filings, consistent with the Commission’s rules. Two parties, Verizon and General Communication Inc. (GCI), filed comments in response to the Commission’s request for comment on AT&T’s appeals.² Verizon supports AT&T’s appeal and GCI agrees that for prior periods – the only periods at issue in AT&T’s appeals – the Commission should direct USAC to accept “any reasonable and consistently-applied methodolog[y]”³ to report subscribers with P.O. boxes. For reasons discussed in AT&T’s appeals and the comments, the

¹ Request for Review by AT&T of Decision of the Universal Service Administrator, CC Docket No. 96-45, WC Docket No. 05-337 (filed April 16, 2013); Request for Review by AT&T of Decision of the Universal Service Administrator, CC Docket No. 96-45, WC Docket No. 05-337 (filed June 22, 2012).

² Verizon Comments, WC Docket No. 05-337, CC Docket No. 96-45 (filed Aug. 9, 2013); GCI Comments, WC Docket No. 05-337, CC Docket No. 96-45 (filed Aug. 9, 2013).

³ GCI Comments at 1.

Commission should find that AT&T's consistent practice of geocoding subscribers with P.O. boxes to the geographic center, or centroid, of the ZIP code was a reasonable methodology for reporting such subscribers.

Both Verizon and GCI note that the subject of AT&T's appeal – how should an ETC report a subscriber with a billing address that includes a P.O. box – has no ongoing relevance to AT&T and other CETCs that no longer file high-cost line counts.⁴ Consequently, we agree with these commenters that it would be “unfair” and a “waste of resources” for the Commission to require AT&T to apply retroactively an all-new methodology for reporting subscribers who have P.O. boxes.⁵ Instead, we agree with GCI that, for past periods, the Commission should instruct USAC to accept “the use of any reasonable and consistently-applied methodologies that approximate correlating the support to the location of the service.”⁶ AT&T's practice of using “industry-standard mapping software [that] geocoded the P.O. box to the zip code centroid”⁷ clearly was reasonable (indeed, it sounds like it is the industry practice) and AT&T applied this methodology consistently so there can be no claim that AT&T was attempting to game its line counts in order to maximize its high-cost support receipts.⁸

The relevant Commission rule requires wireless CETCs to use the customer's billing address for purposes of identifying the service location of the wireless customer in the service area. 47 C.F.R. § 54.307(b). In an order affirming this rule, the Commission was clear that

⁴ Verizon Comments at 2 (explaining that for most CETCs, like AT&T's CETCs, the Commission eliminated high-cost line count filings at the end of 2011); GCI Comments at 1.

⁵ GCI Comments at 1; Verizon Comments at 1.

⁶ GCI Comments at 1. AT&T has no objection to GCI's request that the Commission clarify on a prospective basis that the few CETCs that continue to submit high-cost line count filings are permitted to use post office locations for those subscribers who have P.O. box billing addresses. *Id.* at 2.

⁷ Verizon Comments at 3.

⁸ *See* GCI Comments at 1.

wireless CETCs are to use the billing address “*provided by the customer*” in order to populate high-cost line count filings.⁹ The rule and the Commission’s orders plainly do not direct wireless CETCs to obtain *additional* address information not provided by their customers. But that is exactly what USAC erroneously concluded when it found that AT&T was required to obtain the street addresses of hundreds of post offices. In its appeals, AT&T explained that it does not have ready access to the street addresses of post offices: AT&T’s affiliates would have to either manually search the U.S. Postal Service’s post office search engine for every single ZIP code in their designated areas or purchase database access rights for the sole purpose of obtaining street addresses for U.S. post offices. Both options are burdensome and unnecessary.

As the commenters explain, over the years, a number of carriers have sought timely Commission guidance on various aspects of how to report wireless subscribers in their high-cost line count filings.¹⁰ To date, the Commission has never suggested that geocoding wireless customers with P.O. boxes to the centroid of the ZIP code was inappropriate¹¹ and, in the absence of any clear Commission statement to the contrary,¹² requiring AT&T to obtain additional address information for its subscribers would be inconsistent with the Commission’s requirements in effect during the audit periods. Given that the methodology that AT&T used during these prior periods may have been the norm among the industry,¹³ it would be punitive to AT&T for the Commission to require it, and it alone, to revise old high-cost line count filings to map certain subscribers to the street addresses of their post offices.

⁹ *Federal-State Joint Board on Universal Service*, 20 FCC Rcd 6371, ¶ 82 (2005) (emphasis added).

¹⁰ Verizon Comments at 3; GCI Comments.

¹¹ Verizon Comments 3.

¹² GCI Comments at 1.

¹³ Verizon Comments at 3 (“AT&T followed this industry-standard approach in the instant case.”).

For the reasons detailed in its appeals, these reply comments, and Verizon's and GCI's comments, AT&T requests that the Commission find that AT&T's methodology of geocoding a subscriber with a billing address that includes a P.O. box to the centroid of the subscriber's ZIP code was reasonable. AT&T also requests that the Commission direct USAC to take certain actions with respect to AT&T's audits, as described in AT&T's two appeals.

Respectfully Submitted,

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